

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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E. JEAN CARROLL,

Civil Action No.:
22-cv-10016

Plaintiff,

– against –

DONALD J. TRUMP,

Defendant.
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DECLARATION OF MATTHEW G. DeOREO

I, MATTHEW G. DeOREO, declare as follows under the penalty of perjury:

1. I respectfully submit this Declaration in support of Defendant Donald J. Trump's motion for an Order, pursuant to Fed. R. Civ. P. 59, granting a new trial or remittitur, with such other and further relief as the Court deems just and proper.

2. The sole purpose of this Declaration is to submit Exhibits to the Court. These exhibits are as follows:

- a. **Exhibit A**: A true and accurate copy of Plaintiff's Complaint filed in this Action;
- b. **Exhibit B**: True and complete copies of relevant portions of the trial transcript for this case; and
- c. **Exhibit C**: A true and accurate copy of Plaintiff's Complaint filed in *Carroll I* (*Carroll v. Trump*, 1:20-cv-73 11-LAK).
- d. **Exhibit D**: A true and accurate copy of the Verdict Form filed in this Action

3. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 8, 2023

/s/ Matthew G. DeOreo
MATTHEW G. DeOREO